UNITED STATES DISTRICT COURT DISTRICT OF NEW HAMPSHIRE

United States of America	
Plaintiff,	

Docket No. 1:24-cr-3

v.

Alton Ryan, Defendant

MOTION TO RECOMMEND PLACEMENT IN SOAR/GOVERNMENT ASSENTS

Alton Ryan moves for a recommendation that he be placed in the SOAR Program at the Merrimack County House of Corrections.

The Government assents.

As grounds, Mr. Ryan states:

- 1. He is charged with conspiracy to distribute drugs. Mr. Ryan is detained at the Strafford County House of Corrections.
- 2. During a state offense parole setback, Mr. Ryan completed the FOCUS program at the New Hampshire State Prison. While at the Strafford County House of Corrections, he has completed the Therapeutic Community Program. Recently, he was accepted to Turning Point, a long-term residential rehabilitation program, but the court (Johnstone, J.) ruled that he should remain in detention. Mr. Ryan wishes to continue to avail himself of substance

use treatment while incarcerated, and a transfer to Merrimack to participate in SOAR will allow him to do that.

3. The Government assents to this court recommending that Mr. Ryan be transferred to the Merrimack County House of Corrections to participate in SOAR.

WHEREFORE, Mr. Ryan requests that the court grant this motion.

Respectfully submitted,

ALTON RYAN

By his attorney,

ROTHSTEIN LAW LLC

By: /s/ David M. Rothstein
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CERTIFICATE OF SERVICE

I certify that I have served a copy of this motion on the Assistant United States Attorney this 29 day of January, 2025, via ECF.

/s/ David M. Rothstein
David M. Rothstein